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**UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

Case No: 2:19-cv-02704-DJH

**NOTICE OF FILING  
AMENDMENT TO COMPLAINT  
PURSUANT TO ARCP 15(a)(1)**

PETER STROJNIK, (Sr.)

Plaintiff,

vs.

STATE BAR OF ARIZONA, an Arizona  
nonprofit corporation, SHAUNA MILLER  
and JOHN DOE MILLER, husband and  
wife; MARET VESSELLA and JOHN  
DOE VESSELLA, Husband and Wife;  
YET UNKNOWN ENTITIES AND  
PERSONS WHO PARTICIPATED IN  
THE CONSPIRACY ALLEGED BELOW,

Defendants.

ARCP 15(a)(1)(B) grants Plaintiff the right to amend his Complaint within 21 days of the filing of a motion under [Rule 12\(b\)](#), [\(e\)](#), or [\(f\)](#). Defendant filed its 12(b) Motion on July 1, 2019.

The amendment is necessary in order to allege the torts implicit in the Complaint by formally alleging, in distinct counts, the torts of Civil Conspiracy, Aiding and Abetting, Tortious Interference with Contract, Abuse of Process and Intentional Infliction of Emotional Distress. The amendment also adds Mesdames Miller and Vesella, natural persons, as party defendants.

This right to amendment is exercised once as a matter of course.

1 The redlined amendment is appended hereto as Exhibit 1. Clean version is filed  
2 separately as a new docket entry.

3 DATED this 22<sup>nd</sup> day of July 2019.

4 **PETER STROJNIK**

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6 Peter Strojnik  
7 Plaintiff

8 Filed and distributed through PACER.  
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